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November 4, 2021

Via eFiling

Hon. Paul A. Engelmayer, U.S.D.J.
United States District Court
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: United States v. Hugo Villanueva Torres (1:21-cr-00148-PAE-2)

Dear Judge Engelmayer:

I am writing to respectfully request a 4-week extension of the November 5th deadline for the filing of any Motions to suppress evidence (December 3rd). As the Court is aware, lead counsel in this matter, Stacy Biancamano, was exposed to covid-19 last month. Subsequently, she tested positive and experienced severe symptoms from the virus. Ms. Biancamano's symptoms persisted even after testing negative last week at which time we learned that she had developed pneumonia as a result of the viral infection. Her doctors have her set to run a course of steroids through the end of the month in the hope of having her back on her feet by the beginning of December. That said, as a result of her condition we have not been able to finalize ongoing plea negotiations or prepare Motions in accordance with the previously anticipated timeline. I have discussed the unfortunate circumstances and the details of this request with AUSA Kedar Bhatia who graciously expressed his understanding and advised that he has no objection to the extension of time.

I want to express my sincerest apologies for any inconvenience this request may cause the Court. Your Honor's time, understanding and thoughtful consideration in this matter is truly appreciated.

Respectfully submitted,

/s/ *Daniel J. Holzapfel*

Daniel J. Holzapfel

Cc: Kedar Bhatia, AUSA
Andrew Rohrbach, AUSA
Hugo Villanueva Torres

GRANTED. The Court extends the deadline for defendant Torres to file a suppression motion until December 3, 2021, in light of the circumstances describe herein. The Government's deadline to respond is extended until December 17, 2021. The Court wishes Ms. Biancamano a speedy and full recovery. For avoidance of doubt, the next conference in this case remains as scheduled, on November 22, 2021. The Clerk or Court is requested to terminate the motion at Dkt. No. 73.

SO ORDERED.

11/5/2021



PAUL A. ENGELMAYER
United States District Judge